



July 19<sup>th</sup>, 2016

To: Dennis McLerran, Regional Administrator  
EPA Region 10  
1200 6<sup>th</sup> Ave.  
Seattle, WA 98101  
mclerran.dennis@epa.gov

Dear Mr. McLerran,

We are writing on behalf of the Portland Harbor Community Coalition (PHCC), a group of over a dozen groups representing Native Americans, communities of color, immigrants and refugees, houseless people, and supporters. We are all invested in the outcome of the Willamette River's Superfund site cleanup. We are writing today for two reasons.

First, we request that the EPA extend the current comment period for the Portland Harbor Superfund Cleanup Plan from the current 90 days to 120 days. While we are encouraged by the EPA's announcement on June 24<sup>th</sup> to extend the 60-day notice period to 90 days, 90 days is still inadequate for our community members to evaluate the plan and submit comments, given the complexity and importance of this cleanup.

As of July 7<sup>th</sup>, the EPA did not yet have project materials translated into Spanish. We are already more than 30 days into the comment period. One of our organizers visited the EPA Portland office, and the only translated material available was a Spanish glossary of terms. This is inadequate for Spanish speakers to be fully informed. Many of our community members are immigrants and refugees who speak little to no English, and they should have the ability to understand and comment on the proposed plan. Providing all residents equal access to public participation is required under federal Title VI Civil Rights laws. Given this delay, extending the comment period is the only adequate solution.

We realize that an extension of the public comment period may extend the Record of Decision timeline. We have no problem with that. Contamination of the river has

been centuries in the making, and the EPA has engaged with potentially responsible parties for over sixteen years. The public deserves at least 120 days to understand and influence one of the most complex Superfund cleanups in the country.

Second, we request that the EPA schedule an additional hearing at the end of August, and that this fifth hearing is organized in a different format from the initial public hearings. It is unfair that people have to go to a separate room to make their comments. While this should remain an option in case some people would like to speak more privately, there also needs to be an option for people to make comments in front of EPA decision-makers and the general public. For people who are not accustomed to giving testimony, like many of our groups' members, it is important to see and hear others in order to learn how the process works.

Our communities deserve to have their voices heard. We deserve the opportunity to have a reasonable public comment period that includes the voices of impacted and marginalized community members.

Thank you for your consideration of this request.

Portland Harbor Community Coalition, members and supporters:

American Indian Movement (AIM: Portland Chapter)  
Asian Pacific American Network of Oregon  
Black Bear Environmental Services, LLC  
Collective Care  
East European Coalition  
Green Anchors Partners  
Groundwork Portland  
Iraqi Society of Oregon  
Líderes Verde  
NAYA  
Oregon AFSCME Green  
Portland Youth and Elders Council  
Right to Survive  
SEIU Local 503  
Sierra Club – Oregon Chapter  
Wisdom of the Elders